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Attorneys for Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

LAWYERS' COMMITTEE FOR CIVIL)	CIVIL ACTION NO. 16-CV-0544 KAW
RIGHTS OF THE SAN FRANCISCO BAY)	
AREA; CENTER FOR GENDER & REFUGEE)	
STUDIES; COMMUNITY LEGAL SERVICES))	JOINT REQUEST TO VACATE CASE
IN EAST PALO ALTO; AMERICAN)	MANAGEMENT CONFERENCE AND EXTEND
IMMIGRATION LAWYERS ASSOCIATION,)	DATE FOR RESPONSIVE PLEADING;
)	[PROPOSED] ORDER
Plaintiffs,)	
)	
v.)	
)	CMC Date: October 25, 2016, 1:30 p.m.
EXECUTIVE OFFICE FOR IMMIGRATION)	1301 Clay Street
REVIEW; UNITED STATES DEPARTMENT)	Oakland, CA 94612
OF JUSTICE,)	
)	
Defendants.)	

The parties, through their undersigned attorneys, have cooperatively worked towards settlement of this Freedom of Information Act action and anticipate that it will be resolved in the next few weeks. Defendants have made several productions of agency records and have only one request for information that remains outstanding. Defendants are working diligently to complete their production of agency records in response to this request, and anticipate that they will be able to complete production by the end of the month. Accordingly, the parties hereby stipulate and request pursuant to Civ. L.R. 6-2 and 7-

12 that: (1) the Case Management Conference currently scheduled for October 25, 2016, at 1:30 p.m. be vacated; and (2) the Government's deadline to file a responsive pleading be extended to November 30, 2016. The Court has reset the Case Management Conference and Answer date on two prior occasions, and the parties have stipulated to three one-month extensions of the Answer date as they continue to collaboratively work to resolve this matter.

At this time, Defendants believe that production will be completed in October, but the parties will need additional time to negotiate Plaintiffs' request for attorneys' fees. Defendants' responsive pleading is currently due on October 31, 2016. The parties will work towards completing the remaining production and resolving the request for attorneys' fees in time to file a stipulated dismissal of the case by November 30, 2016. The parties will notify the Court if additional time is needed to resolve the case. If any party subsequently determines that a Case Management Conference is necessary, that party will notify the Court.

A proposed order is attached.

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

Dated: October 11, 2016

By: /s/ Kimberly Friday
KIMBERLY FRIDAY
Assistant United States Attorney
Counsel for the Defendants

Dated: October 11, 2016

By: /s/ Patrick Ferguson
PATRICK FERGUSON
Davis Wright Tremaine LLP
Counsel for Plaintiffs

CERTIFICATION

Pursuant to Local Rule 5-1(i)(3), the undersigned hereby attests that I have conferred with Patrick Ferguson, counsel for plaintiffs, regarding this filing. Mr. Ferguson has represented that he concurs in the filing of this document and that I am authorized to file it on his behalf.

BRIAN J. STRETCH
United States Attorney

Dated: October 11, 2016

By: /s/ Kimberly Friday
KIMBERLY FRIDAY
Assistant United States Attorney
Counsel for the Defendants

[PROPOSED] ORDER

Pursuant to stipulation, it is so ordered that the Case Management Conference currently set for October 25, 2016, is hereby vacated. Defendants' responsive pleading is due November 30, 2016.

SO ORDERED.

DATED: 10/18/16

Kandis Westmore
HONORABLE KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE